

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Kimberly A. Bocelli
Debtor

SN Servicing Corporation as servicer
for U.S. Bank Trust National
Association as Trustee of Cabana
Series V Trust
v.

Kimberly A. Bocelli
ROBERT W. SEITZER
Respondents

CASE NO.: 24-13859-amc

CHAPTER 7

Judge: Ashely M. Chan

Hearing Date: December 18, 2024 at 12:30PM

Objection Deadline: December 3, 2024

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

PLEASE TAKE NOTICE, that SN Servicing Corporation as servicer for U.S. Bank Trust National Association as Trustee of Cabana Series V Trust (on behalf of itself and together with any successor and/or assign “Movant”), filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. § 362 (d)(2); vacating the automatic stay to permit Movant, its successors and/or assigns, to enforce its mortgage on the Debtor’s premises located at 2714 South Smedley Street, Philadelphia, PA 19145; vacating the co-debtor stay in effect pursuant to 11 U.S.C. § 1301(a).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before December 3, 2024, you or your attorney must do all of the following:

- (a) file an answer explaining your position at
United States Bankruptcy Court
Eastern District of Pennsylvania
900 Market Street
Suite 204
Robert N.C. Nix Sr. Federal Courthouse
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Lauren Moyer
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
Phone: (212) 471-5100
Fax: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Judge Ashely M. Chan at 900 Market Street, Suite 204, Robert N.C. Nix Sr. Federal Courthouse, Philadelphia, PA 19107 on December 18, 2024 at 12:30PM, unless otherwise ordered by the Court.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2830 to find out whether the hearing has been canceled because no one filed an answer.

Dated: November 19, 2024

By: /s/ Lauren Moyer
Lauren Moyer, Esq.
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